

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE TORONTO-DOMINION BANK
SECURITIES LITIGATION

: 1:17-cv-1665 (NLH/JS)
: Class Action
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**PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE THAT on July 15, 2019, or on a date to be set by this Court, Lead Plaintiff Ethan Silverman and Plaintiff Mark Blumenthal (together, "Plaintiffs"), individually and on behalf of all Settlement Class Members, pursuant to Fed. R. Civ. P. 23(e), by their undersigned counsel, will and do hereby move this Honorable Court, before the Honorable Noel L. Hillman, U.S.D.J. at the Mitchell H. Cohen Building & U.S. Courthouse, 4th and Cooper Streets, Camden, NJ 08101, for entry of an order: (i) granting preliminary approval of the proposed Settlement; (ii) granting conditional certification of the Settlement Class with Plaintiffs as Class Representatives and Lead Counsel as Class Counsel; (iii) approving the form and manner of giving notice of the proposed Settlement to the Settlement Class; (iv) setting a date for a Settlement Fairness Hearing that is convenient for the Court, preferably in late September 2019; and (v) setting deadlines for mailing of the Notice and publishing of the Publication Notice, for Settlement Class Member objections and requests for exclusion, for the filing of Plaintiffs' motion for Final Approval of the Settlement, and for the filing of Lead Counsel's application for an award of attorneys' fees and reimbursement of expenses and compensatory awards to Plaintiffs.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Matthew L. Tuccillo, Esq. and its exhibits, which are the Stipulation of Settlement and its Exhibits A through E, all of which are filed simultaneously herewith, and other such matters and argument as the Court may consider at any hearing that might be held on this motion.

Defendants do not oppose the relief sought by this motion.

Dated: June 20, 2019

Respectfully submitted,

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